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 401 M St., SW
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June 25, 2001

Ms. Christine Todd Whitman, Administrator
 US. Environmental Protection Agency
 Document Control Office (7407)
 Office of Pollution Prevention and Toxics (OPPT)
 1200 Pennsylvania Ave. NW.
 Washington, DC 20460

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Re: Voluntary Children's Chemical Evaluation Program (VCCEP);
OPPTS-00247D

BP endorses and applauds the Agency's effort to better understand the potential health risks associated with chemicals to which children might be exposed. These efforts are very much in line with our commitments under Responsible Care, to fully understand the potential impacts of the substances we produce and to ensure that the materials we produce can be used safely and cause no harm to human health or the environment. We also applaud the Agency's approach of asking for a voluntary effort to generate data in a tiered fashion and of encouraging industry groups to form consortia to gather data and exposure information, and where necessary, to fill data gaps should these exist.

We have reviewed the list of the 23 chemicals in the VCCEP pilot program and we find the following materials produced by BP:

| CHEMICAL | CASRN |
|--------------|----------|
| BENZENE | 71-43-2 |
| TOLUENE | 108-88-3 |
| m-XYLENE | 108-38-3 |
| ETHYLBENZENE | 100-41-4 |

Contain NO CBI

As a member of the American Chemistry Council's Benzene Team, Toluene & Xylene VCCEP Consortium and Ethylbenzene Panel, BP is happy to volunteer to sponsor all of these materials in Tier 1 of the EPA's VCCEP Pilot. The details of start date, submission dates and more specificity surrounding the expected outputs from Tier 1 of this Pilot Program are contained in, and incorporated herein by this reference, a separate letter which will be delivered to you on June 25, 2001 from each Panel, Consortium or Team.

The technical contact within BP for this program is:

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Senior Toxicologist
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Please contact Mr. Dutton if you have any questions regarding this commitment or BP's participation in the Panel, Consortium or Team referenced above.

Yours truly,

Mark L. Noetzel
Group Vice President

cc: Mr. Stephen L. Johnson, U.S. EPA
Mr. Charles M. Auer, U.S. EPA
Ms. Mary Ellen Webber, U.S. EPA
Ms. Lee Salamone, The American Chemistry Council